

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Complaint on Sunday
and Holiday Collections

Docket No. C2001-1

COMPELLED RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO DFC/USPS-53 AND DBP/USPS-14, STATUS REPORT ON
DFC/USPS-50, AND MOTION FOR LATE ACCEPTANCE
(August 7, 2001)

Presiding Officer's Ruling No. C2001-1/7 (July 27, 2001) compelled responses to DFC/USPS-50 and 53, and DBP/USPS-14. Attached are compelled responses to DFC/USPS-53 and DBP/USPS-14. Each interrogatory is stated verbatim, and followed by the response.

As indicated in the Postal Service's objection and opposition to the motion to compel, the task of responding to DFC/USPS-50 is one which will take several weeks because of the need to obtain information from the field. Spreadsheets have been created to facilitate communication to the field of exact identification of the information desired, to facilitate communication from the field of the responsive information, and to facilitate organization of the materials received. Those spreadsheets have been distributed with a memorandum from the acting head of Operations directing field units to respond. Responses from the field are starting to arrive, but it is anticipated that the balance will not be received until the middle of next week. Assuming timely compliance by all units, and a day or so to create an aggregate library reference of responses, a reasonable estimate at this point is the filing of a response by the end of next week. Of

course, if complete information were to become available sooner, the Postal Service will file it as soon as possible.


P.O. Ruling No. 7 did not specify a time for response, and the default time for filing compelled responses under Rule 27(e) is seven days. With respect to DFC/USPS-53 and DBP/USPS-14, it was not possible to meet that provision because of counsel's previously scheduled absence from the office. The Postal Service submits that no party should be prejudiced by the delay of two business days, and therefore moves for late acceptance of those responses. Additionally, the Postal Service moves for late acceptance of the response to DFC/USPS-50 whenever it becomes available, if there is deemed a need for any such motion under the above-described circumstances.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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August 7, 2001

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DOUGLAS F. CARLSON**

DFC/USPS-53. Please provide all reports, studies, literature, and other documents in the possession of Postal Service marketing staff or other staff that describe, either in specific terms or general conceptual terms, the number of times that an advertising or other message should run, and the frequency with which it should run, in order to reach particular or desired percentages of the audience, as well as the number of media outlets in which an advertising message should run in order to reach particular or desired percentages of the population.

RESPONSE:

In accordance with P.O. Ruling No. C2001-1/7 (July 27, 2001), this response treats the question as if the "advertising" terminology were modified to instead refer to "public service information messages." Inquiries to the field communications staff and to the staff responsible for coordinating publicity for postal rate implementations revealed no awareness of any reports, studies, or other documents responsive to this request. In general, those staffs rely on their experience, and that of their predecessors, to determine the steps they take to convey their messages to the public.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID B. POPKIN**

DBP/USPS-14 Please refer to your response to DBP/USPS-1a. [a] Please confirm that the Postal Operations Manual is available to members of the general public. [b] Please confirm that members of the general public may properly assume that the policies, regulations, and procedures of the Postal Service that are contained in the POM will be complied with by the Postal Service. [c] Please explain any subparts that you are not able to confirm.

RESPONSE:

a. The POM is not available to the members of the general public in the sense that the DMM is available to the members of the general public. Under 39 CFR § 111.2, the DMM is available for public inspection during regular business hours at the Headquarter's library, at area and district offices, and at post offices. There is no corresponding provision regarding the POM. Were the POM intended to be widely available to the public, there would be no apparent reason why the exhibit in the POM regarding holiday service would be reprinted in the DMM. Conversely, the POM is not treated as a proprietary document by the Postal Service, and in that sense, is available to members of the general public.

b. As has been well-established long before initiation of this proceeding, neither the members of the general public nor anyone else can properly assume that provisions of the POM regarding Sunday and holiday collection service reflect current operational practices.

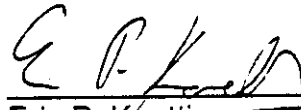
c. See above.

CERTIFICATE OF SERVICE

I hereby certify that, in accordance with section 12 of the Rules of Practice, I have this day served the foregoing document upon:

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